

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

GEORGE WILSON,

\*

Plaintiff,

\*

v.

\*

Case No.

SOCIAL BICYCLES LLC, et al.

\*

Defendant.

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\* \* \* \* \*

**NOTICE OF REMOVAL**

Defendants, Social Bicycles LLC, Uber Technologies, Inc. and Uber USA, LLC, hereby remove Case No. 24-C-22-002215 from the Circuit Court for Baltimore City, Maryland, to the United States District Court for the District of Maryland, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, and as grounds for its removal states as follows:

**Statement of the Case**

1. The above-captioned action was filed by Plaintiff George Wilson on or about May 6, 2022 in the Circuit Court for Baltimore City, Maryland, Case No. 24-C-22-002215. A copy of the Complaint is attached hereto as **Exhibit A**.

2. Defendant Social Bicycles LLC was served with the summons and Complaint on May 13, 2022. Attached hereto as **Exhibit B**.

3. Defendant Uber Technologies Inc. was served with the summons and Complaint on May 13, 2022. Attached hereto as **Exhibit C**.

4. Defendant Uber USA LLC was served with the summons and Complaint on May 13, 2022. Attached hereto as **Exhibit D**.

5. Defendants Social Bicycles LLC, Uber Technologies Inc. and Uber USA LLC filed their Answer to Plaintiff's Complaint in the Circuit Court for Baltimore City, Maryland, Case No. 24-C-22-002215 on June 9, 2022. Attached hereto as **Exhibit E**.

6. The Complaint purports to assert nine causes of action, all of which sound in tort:

- Count I: Negligence against Social Bicycles, LLC
- Count II: Negligence against Uber Technologies, Inc.
- Count III: Negligence against Uber USA, LLC
- Count IV: Products liability (defect in manufacture) against Social Bicycles, LLC
- Count V: Products liability (defect in manufacture) against Uber Technologies, Inc.
- Count VI: Products liability (defect in manufacture) against Uber USA, LLC
- Count VII: Products liability (defect in design) against Social Bicycles, LLC
- Count VIII: Products liability (defect in design) against Uber Technologies, Inc.
- Count IX: Products liability (defect in design) against Uber USA, LLC

7. Plaintiff seeks relief including compensatory and other damages "in the amount in excess of seventy-five thousand dollars." *See Exhibit A*, p. 12.

**Diversity Jurisdiction pursuant to 28 U.S.C. §1332(a)**

8. This Court has jurisdiction over this matter under 28 U.S.C. §1332(a), because there is complete diversity of citizenship between Plaintiff and Defendants, and more than \$75,000 (exclusive of interest and costs) is at stake.

9. Plaintiff alleges that he is a resident/citizen of Maryland.

10. None of the Defendants are "citizens" of Maryland. Defendant Social Bicycles LLC is a limited liability company that was formed in the State of Delaware. None of its members are citizens of the State of Maryland. Uber USA, LLC is a limited liability company that was formed

in the State of Delaware. None of its members are citizens of the State of Maryland. Uber Technologies, Inc. is not a citizen of Maryland because it is a corporation, respectively, organized and existing under and by virtue of the laws of Delaware with its principal place of business located in San Francisco, California.

11. Plaintiff in this action requests unspecified compensatory damages in excess of \$75,000, as well as costs, pre-judgment interest, and post-judgment interest. Thus, over \$75,000 is in controversy and the jurisdictional threshold under 28 U.S.C. §1332(a) is satisfied.

### **Conclusion**

12. Pursuant to 28 U.S.C. § 1446(a) and Local Rule 103.5.a. a true and correct copy of all of the process, pleadings, orders, and documents from the State Court Action which have been served upon Defendants, Social Bicycles LLC, Uber Technologies, Inc. and Uber USA, LLC, are being filed with this Notice of Removal.

13. This Notice of Removal is being filed within 30 days of the date that Social Bicycles LLC, Uber Technologies, Inc. and Uber USA, LLC were served with the Summons and Complaint in this matter. Removal is therefore timely in accordance with 28 U.S.C. § 1446(b).

14. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1441(a) and 1446(a) because the U.S. District Court for the District of Maryland is the federal judicial district embracing the Circuit Court for Baltimore City, where the State Court Action was originally filed.

15. By notice of Removal, Defendants, Social Bicycles LLC, Uber Technologies, Inc. and Uber USA, LLC, do not waive any objections they may have as to service, jurisdiction, or venue, or any other defenses or objections they may have to this action. Defendants intend no admission of fact, law, or liability by this Notice, and expressly reserve all defenses, motions, and or pleas.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

*/s/ Christine R. Hogan*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of June, 2022, a copy of this Notice of Removal was served via CM/ECF to the following counsel of record:

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*/s/ Christine R. Hogan*

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Christine R. Hogan